

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO, EASTERN DIVISION**

STACEY WELLINGTON, et al.,

Plaintiffs,

vs.

**LAKE HOSPITAL SYSTEM, INC., et
al.,**

Defendant.

CASE NO. 1:19-CV-00938

**MAGISTRATE JUDGE THOMAS M.
PARKER**

**DEFENDANT PHILLIP BROOKS'
MOTION FOR SANCTIONS**

Now comes Defendant Phillip Brooks, by and through undersigned counsel, and respectfully joins in Lake Health's Motion for Sanctions, Doc ## 55 and 61. For those reasons stated therein, Mr. Brooks requests an order dismissing Plaintiff's Second Amended Complaint with prejudice and awarding attorney's fees and costs. Mr. Brooks further requests and reserves the right to participate in the September 13, 2019 evidentiary hearing on the pending Motion for Sanctions.

Respectfully submitted,

DICAUDO, PITCHFORD & YODER, LLC

/s/J. Reid Yoder

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CERTIFICATE OF SERVICE

I hereby certify that on the foregoing was served via the Court's electronic filing system upon all parties of record.

/s/J. Reid Yoder

J. Reid Yoder (0076587)
Benjamin R. Sorber (0092739)